

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

vs.

DONNELL RUSSELL,

Defendant.

No. 20-cr-538 (PGG)

**DEFENDANT RUSSELL'S NOTICE OF MOTION *IN LIMINE* TO
PRECLUDE WITNESS TESTIMONY CHARACTERIZING A
COMMUNICATION AS A THREAT (MIL NO. 2)**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law, defendant Donnell Russell, pursuant to Rule 701 of the Federal Rules of Evidence, will move the Court, before the Honorable Paul G. Gardephe at the United States Courthouse, 500 Pearl Street, Courtroom 705, New York, New York 10007, for an Order precluding witness testimony characterizing a communication as a threat.

Dated: June 27, 2022

/s/ Michael G. Freedman
THE FREEDMAN FIRM PC
800 Wilshire Blvd., Suite 1050
Los Angeles, CA 90017
Telephone: (213) 816-1700
Facsimile: (213) 816-1706
E-Mail: michael@thefreedmanfirm.com

Attorney for Defendant Donnell Russell

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2022, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Michael G. Freedman
Michael G. Freedman